

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

JEAN JONES
Plaintiff,

v.

PORTFOLIO RECOVERY ASSOCIATES,
LLC and WESTERN SURETY COMPANY
Defendant.

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Case No. 1:16-cv-00572-RP

**DEFENDANTS PORTFOLIO RECOVERY ASSOCIATES, LLC & WESTERN SURETY
COMPANY'S STATEMENT AND IDENTIFICATION OF EXHIBITS**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Defendants Portfolio Recovery Associates, LLC ("PRA") and Western Surety Company ("Defendants"), and file their Statement and Identification of Exhibits Expected to be Offered for Introduction at Trial, pursuant to Local Rule 16(e)(4):

<u>Exhibit</u>	<u>Expected or Contingent</u>	<u>Name of Exhibit</u>
A	Expected	Jean Jones Account History. PRA 0001-0007
B	Expected	PRA Policies and Procedures for Customer Disputes Procedures.
C	Expected	PRA Disputes Department Supplemental Training Manual.
D	Expected	PRA Policies and Procedures for Making and Deleting Credit Reports.
E	Contingent upon admission of Plaintiff's Dispute Letter	Dispute Facsimile, Joseph Ozmun
F	Contingent upon admission of Plaintiff's Dispute Letter	Dispute Facsimile, Nicolas Palomo
G	Contingent upon admission of Plaintiff's Dispute Letter	Dispute Facsimile, Bradley Cousins

WHEREFORE, PREMISES CONSIDERED, Defendants prays the Court accept the foregoing Statement and Identification of Exhibits Expected to be Offered and Introduced at Trial.

Respectfully submitted,

MALONE AKERLY MARTIN PLLC

/s/ Robbie Malone

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the Defendants Portfolio Recovery Associates, LLC & Western Surety Company's Statement and Identification of Exhibits has been forwarded via CM/ECF on this 14th day of August, 2017 to:

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